

Exhibit 7

KIND Declaration

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

L.F.O.P., E.C.C., and J.C.C.

Plaintiffs,

v.

Alejandro Mayorkas, Secretary
U.S. DEPARTMENT OF HOMELAND SECURITY,
and **Ur Mendoza Jaddou**, Director, U.S. CITIZENSHIP
AND IMMIGRATION SERVICES,

Defendants.

**DECLARATION OF
ALEXANDRA PEREDO
CARROLL, ESQ.,
ATTORNEY AT KIDS IN
NEED OF DEFENSE (KIND)**

Case No.

1. My name is Alexandra Peredo Carroll. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief. If called as a witness, I could and would testify as follows.
2. I am an attorney admitted to practice in the state of Massachusetts, and I am the managing attorney of the Boston field office of Kids in Need of Defense (KIND), where I have worked since January 19, 2016.
3. KIND is a national nonprofit organization dedicated to providing free legal representation to unaccompanied minors in their immigration removal proceedings. KIND's staff attorneys and its pro bono partners represent many children who have been granted Special Immigrant Juvenile Status (SIJS). KIND's Boston Field Office serves clients in Massachusetts, especially Boston and surrounding areas, and, to a lesser extent, some neighboring states.
4. In the period of approximately November 2019 to December 2020, staff and pro bono attorneys supported by KIND's Boston office received denials of approximately 55 I-765 Applications for Employment Authorization filed under category (c)(11) on behalf of clients who had been granted SIJS. Each of these denial notices states in substance that generally, USCIS grants employment authorization under 8 CFR § 274a.12(c)(11) to applicants who are in parole status as evidenced by a valid Form I-94, Arrival/Departure Record, which was not provided to these applicants when granted SIJS.

5. In our experience, USCIS has never issued an I-94 evincing parole status to a child granted Special Immigrant Juvenile Status.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on September 15, 2021 in El Paso, Texas.

By:


